

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

REBECCA FRANCESCATTI, an individual,

Plaintiff,

v.

STEFANI JOANNE GERMANOTTA, an individual, a.k.a."Lady Gaga," INTERSCOPE RECORDS, UNIVERSAL MUSIC GROUP, INC., DJ WHITE SHADOW, LLC, and BRIAN JOSEPH GAYNOR, an individual,

Defendants.

Case No. 1:11-cv-5270

JURY TRIAL DEMANDED

Judge Blanche M. Manning  
Mag. Judge Jeffrey T. Gilbert

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff, Rebecca Francescatti respectfully moves this Court for leave to file under seal the following documents:

1. Plaintiff's Response to Defendant's L.R. 56.1 Statement of Undisputed Facts in Support of Their Motion for Summary Judgment and Plaintiff's L.R. 56.1 Statements of Additional Fact;
2. Exhibits A, B, C, E, F, J, K, M, N, BB, CC, DD, EE, JJ, PP to Plaintiff's Response;
3. Exhibit QQ - Confidential Summary Judgment Disc containing Confidential Video Files 1, 2, and 3 and Audio Track 1;
4. Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment;

Where possible, redacted public versions of these documents were filed on April 10, 2013. Unredacted copies will be delivered to counsel for all parties and to chambers.

The parties to this proceeding are subject to a Protective Order regarding certain Confidential information, which order was entered by the Court on February 15, 2012 and

provides, among other things, that if a party wishes to use any confidential information in Court papers, such confidential information shall be maintained under seal by the clerk.

These documents have been designated as, or cite and/or refer to, information that has been designated as either (a) "Confidential" or (b) "Highly Confidential – Attorneys Eyes Only." Accordingly, Plaintiff respectfully requests that the Court permit these documents to be filed under seal.

Dated: March 4, 2013

Respectfully submitted,

/s/ William L. Niro

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 10, 2013 the foregoing

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was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record.

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*/s/ William L. Niro*  
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